

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP, D/B/A
VERIZON WIRELESS AND VERIZON
CORPORATE SERVICES GROUP INC.,

Defendants.

Case No. 2:23-cv-00352-JRG-RSP

JURY DEMANDED

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT
CORP.,

Defendants.

Civil Action No. 2:23-cv-00379-JRG-RSP
(Lead Case)

JURY TRIAL DEMANDED

HEADWATER RESEARCH LLC,

Plaintiff,

v.

T-MOBILE USA, INC. AND SPRINT
CORP.,

Defendants.

Civil Action No. 2:23-cv-00377-JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC'S
UNOPPOSED MOTION TO EXTEND RESPONSE DEADLINE**

Plaintiff Headwater Research, LLC (“Headwater”) respectfully requests to extend the deadline to respond to Verizon and T-Mobile’s Motion to Compel Its On Documents (Dkt. 142 (2:23-cv-00352), Dkt. 141 (2:23-cv-00379)) (the “Motion”) by two days.

The Motion was filed on January 22, 2025. Headwater’s response to the Motion is due on February 5, 2025. *See* Local CV-7(e). Headwater seeks a two-day extension to its deadline to respond to the Motion, which would move the deadline from February 5, 2025 to February 7, 2025.

Good cause exists to modify Headwater’s response deadline because counsel for Headwater involved in preparing its response to the Motion were also involved in the discovery hearing before Judge Payne this morning. Defendants do not oppose this request. The requested extension is not sought for the purpose of delay and will not require extension of any other deadlines.

Dated: February 5, 2025

Respectfully submitted,

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF,
Headwater Research LLC**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 5th day of February 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster
Marc Fenster

CERTIFICATE OF CONFERENCE OF COUNSEL

I hereby certify that counsel of record for Headwater and Defendants Verizon and T-Mobile have met and conferred in compliance with Local CV-7(h). Defendants do not oppose this motion.

/s/ Marc Fenster
Marc Fenster